To: Daly, Eric[Daly.Eric@epa.gov]; Joel Belloni[Joel.Belloni@usecology.com]; Nguyen, Lyndsey[Nguyen.Lyndsey@epa.gov]; Peter.Lisichenko@WestonSolutions.com[Peter.Lisichenko@WestonSolutions.com]; Robert.Croskey@WestonSolutions.com[Robert.Croskey@WestonSolutions.com]; Joe Weismann[joe.weismann@usecology.com]
Cc: Tim Curtin[tcurtin16@aol.com]
From: Cory McMann
Sent: Tue 11/29/2016 9:49:39 PM
Subject: RE: NFB Site: Profile Finalization
removed.txt

Thanks Eric,

It's difficult to negate the chromium results based on the blank results and since there are lead and barium concerns I recommend running TCLP for those constituents.

Joe, I know you approved the rad procedure are you waiting on additional analysis?

Cory

From: Daly, Eric [mailto:Daly.Eric@epa.gov]
Sent: Tuesday, November 29, 2016 12:52 PM
To: Cory McMann <Cory.McMann@usecology.com>; Joel Belloni <Joel.Belloni@usecology.com>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko@WestonSolutions.com; Robert.Croskey@WestonSolutions.com
Cc: Tim Curtin <tcurtin16@aol.com>
Subject: NFB Site: Profile Finalization
Importance: High

Hi:

I apologize for the delayed response. I am in our REOC this week and addressing response issues. I understand. I actually have a write up that I always use. I wanted to make sure we were all on same page. I made a pdf of my cheat sheet and attached.

As I look closer to the data, I see a note on the chromium results "Compound was found in the blank and sample". **So I assume there was a cross contamination issue in the lab? Does that put in question all values for the chromium results?**
ID: N001-SS001-1224-01, Lab Sample 160-13352-1, page 18, Chromium is at 1600 mg/kg, ID: N002-SS001-0012-01, Lab Sample 160-13352-8, page 25, Chromium is at 210 mg/kg, ID: N003-SS001-1022-1, Lab Sample160-13352-15, page 32, Chromium is at 970 mg/kg, ID: N003-SS003-1224-01, Lab Sample 160-13352-17, page 34, Chromium is at 860 mg/kg, ID: N003-SS003-1224-02, Lab Sample 160-13352-18, page 35, Chromium is at 790 mg/kg?

ID: N001-SS006-0012-01, Lab Sample 160-13352-6, page 23, Lead is at 110 mg/kg . **For this sample the Rule of 20 would be 5.5 mg/l of lead with the limit being 5.0 mg/l.**

ID: N001-SS007-0012-01, Lab Sample 160-13352-7, page 24, Barium is at 4300 mg/kg. **For this sample the Rule of 20 would be 215 mg/l of Barium with the limit being 100 mg/l.**

ID: N002-TRENCH-0003-01, Lab Sample 160-13352-14, page 31, Chromium is at 280 mg/kg (**14 mg/l: 5.0 mg/l)**, Lead at 1300 mg/kg (**65 mg/l: 5 mg/l**. This may be the one regarding the Trench you speak of below.

We will have a TCLP sampling strategy for the waste. At this time, we will only be sampling/analyzing the material we have excavated and plan to dispose. We need to put a rush on this analytical in order to

get the disposal process moving. At a later date we will obtain TCLP information for other areas.

So as I understand it, our radiological procedures are approved but we just need to verify the RCRA characteristics.

Please let me know if there are any questions at this time.

Regards,
Eric M. Daly
On-Scene Coordinator/Radiological Response Specialist
US Environmental Protection Agency- Region II
ERRD/RPB/PPS
2890 Woodbridge Avenue
Edison, NJ 08837
daly.eric@epa.gov
908-420-1707
"We must, indeed, all hang together, or assuredly we shall all hang separately", Benjamin Franklin

---

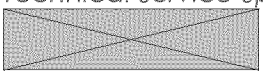
From: Cory McMann [mailto:Cory.McMann@usecology.com]
Sent: Tuesday, November 29, 2016 9:05 AM
To: Joel Belloni <Joel.Belloni@usecology.com>; Daly, Eric <Daly.Eric@epa.gov>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko@WestonSolutions.com; Robert.Croskey@WestonSolutions.com
Cc: Tim Curtin <tcurtin16@aol.com>
Subject: RE: NFB Site: Profile Finalization

Just to clarify, the total results divide by 20 are the hurdle based on the analysis provided. If TCLP analysis on representative sample(s) can be completed showing the levels below are not exceeded the waste can be accepted at WDI. However, if the analysis shows the waste exhibits a characteristic the waste can still be accepted for stabilization at MDI (with some profile modifications) and final disposal to occur at WDI.

Cory

From: Joel Belloni
Sent: Tuesday, November 29, 2016 8:52 AM
To: Daly, Eric <Daly.Eric@epa.gov>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko@WestonSolutions.com; Robert.Croskey@WestonSolutions.com
Cc: Cory McMann <Cory.McMann@usecology.com>; Tim Curtin <tcurtin16@aol.com>
Subject: RE: NFB Site: Profile Finalization

Chromium should be below 5 mg/L, Lead below 5 mg/L and Barium below 100 mg/L.

Joel D. Belloni
Technical Service Specialist

734.521.8015
734.589.9608 cell
joel.belloni@usecology.com
In observance of the Thanksgiving holiday, US Ecology will be closed on 11/24/2016 and 11/25/2016

From: Daly, Eric [mailto:Daly.Eric@epa.gov]

Sent: Tuesday, November 29, 2016 8:46 AM
To: Joel Belloni <Joel.Belloni@usecology.com>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko@WestonSolutions.com; Robert.Croskey@WestonSolutions.com
Subject: NFB Site: Profile Finalization

Good Morning Everyone:

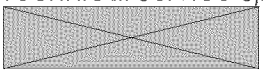
I hope everyone had a nice holiday. I am hoping to get back on track with our profile finalization. As far as the metals exceedance, we are working on a proposal for TCLP analysis. Joel, what regulatory levels are you referring to so we are all on the same page.

Thanks

From: Joel Belloni [mailto:Joel.Belloni@usecology.com]
Sent: Thursday, November 17, 2016 4:14 PM
To: Daly, Eric <Daly.Eric@epa.gov>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko@WestonSolutions.com; Robert.Croskey@WestonSolutions.com
Subject: RE: Profile Finalization- Niagara Falls

ID: N001-SS001-1224-01, Lab Sample 160-13352-1, page 18, Chromium is at 1600 mg/kg
ID: N001-SS006-0012-01, Lab Sample 160-13352-6, page 23, Lead is at 110 mg/kg
ID: N001-SS007-0012-01, Lab Sample 160-13352-7, page 24, Barium is at 4300 mg/kg
ID: N002-SS001-0012-01, Lab Sample 160-13352-8, page 25, Chromium is at 210 mg/kg
ID: N002-TRENCH-0003-01, Lab Sample 160-13352-14, page 31, Chromium is at 280 mg/kg , Lead at 1300 mg/kg. This may be the one regarding the Trench you speak of below.
ID: N003-SS001-1022-1, Lab Sample160-13352-15, page 32, Chromium is at 970 mg/kg
ID: N003-SS003-1224-01, Lab Sample 160-13352-17, page 34, Chromium is at 860 mg/kg
ID: N003-SS003-1224-02, Lab Sample 160-13352-18, page 35, Chromium is at 790 mg/kg

Thank you,

Joel D. Belloni
Technical Service Specialist

734.521.8015
734.589.9608 cell
joel.belloni@usecology.com
In observance of the Thanksgiving holiday, US Ecology will be closed on 11/24/2016 and 11/25/2016

From: Daly, Eric [mailto:Daly.Eric@epa.gov]
Sent: Thursday, November 17, 2016 3:34 PM
To: Joel Belloni <Joel.Belloni@usecology.com>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko@WestonSolutions.com; Robert.Croskey@WestonSolutions.com
Subject: RE: Profile Finalization- Niagara Falls

Hi Joel:

Could you please identify which samples you are referring to? If one result for high lead is the GNBC Warehouse 4 Trench Sample, we are aware and spoke about handling this one area separately. That was an oil drain and we took a sample there just for that purpose. That does not represent the entire Site. Please note, that area is not one of the areas planned to initially ship in 2016.

Thanks

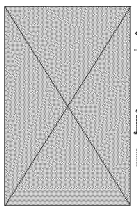
From: Joel Belloni [mailto:Joel.Belloni@usecology.com]
Sent: Thursday, November 17, 2016 2:07 PM
To: Daly, Eric <Daly.Eric@epa.gov>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>
Subject: Profile Finalization- Niagara Falls

Good Afternoon-

We have completed the review of the radiological portion of the analysis and we have an outstanding issue in regards to the RCRA component. In the analysis attached, there are several hits for Cadmium and Lead that are above regulatory levels. Since this analysis was ran in totals, some of the hits are not below the divide by twenty rule. Is there any TCLP analysis available? Would it be possible to pull a representative sample prior to shipping to show the codes don't apply?

Let me know your thoughts and we can wrap this up shortly.

Regards,



Joel D. Belloni
Technical Service Specialist

joel.belloni@usecology.com
p: 734.521.8015 | c: 734.589.9608 | f: 734.521.8142

17440 College Parkway Suite 300 Livonia, MI 48152
In observance of the Thanksgiving holiday, US Ecology will be closed on 11/24/2016 and 11/25/2016
Emergency Response: 800.839.3975
Customer Service: 800.592.5489